

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**LIBERTARIAN NATIONAL
COMMITTEE, INC.,**

Plaintiff,

v.

**MIKE SALIBA, RAFAEL WOLF,
GREG STEMPFLE, ANGELA
THORNTON-CANNY, JAMI
VAN ALSTINE, MARY
BUZUMA, DAVID CANNY,
and JOSEPH BRUNGARDT,**

Defendants.

Case No. 23-cv-11074

Hon. Judith E. Levy

DECLARATION OF JAMI VAN ALSTINE

Under 28 U.S.C. § 1746, I, Jami Van Alstine, declare as follows under penalty of perjury:

1. I am over the age of 18, of sound mind, and otherwise competent to provide this declaration.
2. I am a member of the Libertarian Party of Michigan (LPM).
3. I currently serve on the LPM executive committee as its secretary. I was elected to that position at LPM's April 2023 convention in Lansing.
4. In my role as secretary, I am responsible for maintaining LPM's official documents, including minutes of LPM conventions and executive committee

meetings, as well as LPM's bylaws and other governing documents, and am also responsible for maintaining LPM's website (michiganlp.net) and various social media pages.

5. As LPM secretary, I certify that all eight defendants named in the above-captioned case are members of the LPM. I am not aware of any action taken by the LNC nor by the unauthorized board chaired by Mr. Andrew Chadderdon to revoke their LPM membership status, nor do I believe that either of those entities has the authority to revoke LPM membership status.

6. I have also reviewed the exhibits attached to *Defendants' Response to Motion for Preliminary Injunction* in the above-captioned case (the "Exhibits")

7. Exhibit 6 is a true and accurate copy of the Bylaws of the Libertarian Party of Michigan (June 26, 2021 ed.), which were in effect during the LPM convention held in July 2022 in Holland, Michigan. These bylaws are separate and distinct from the bylaws of the Libertarian Party of Michigan Executive Committee, Inc.

8. Exhibit 7 is a true and accurate copy of the second-amended complaint filed in *Comerica Bank v Libertarian Party of Michigan, et al.*

9. Exhibit 8 is a true and accurate copy of the draft minutes of the April 2023 LPM convention in Lansing. Those minutes will be presented to the LPM membership for approval at the party's 2024 convention.

10. Exhibit 9 is comprised of true and accurate copies of emails sent to all registered members of the LPM by LPM Chair Brungardt or LPM Chair Saliba on the dates indicated in the top-left corner of each email.

11. Exhibit 11 is a true and accurate copy of FEC complaint filed by LNC Chair McArdle as MUR 8130, minus the exhibits that were attached thereto.

12. Exhibit 12 is a true and accurate copy of the following article, Kelly Weill, Libertarian Party is Fighting a Civil War Over its Right-Wing Mises Caucus, *The Daily Beast*, September 29, 2022, as it existed on <<https://www.thedailybeast.com/libertarian-party-is-fighting-a-civil-war-over-its-right-wing-mises-caucus>> as of the date this declaration it was signed.

13. Exhibit 13 is comprised of a true and accurate copies of printouts from Incfight.org that reflect the content on that website as of the date this declaration was signed.

14. Exhibit 14 is comprised of a true and accurate copies of printouts from michiganlp.net that reflect the content on that website as of the date this declaration was signed.

15. Exhibit 15 is a true and accurate copy of the official minutes of the July 2022 LPM convention in Holland, Michigan.

16. Exhibit 16 is a true and accurate copy of the official minutes of the LNC executive committee meeting on February 5, 2023, as posted on the LNC's official website at <https://www.lp.org/lnc-meeting-archives/>.

17. Exhibit 17 is a true and accurate copy of the official minutes of the LNC executive committee meeting on March 8, 2023, as posted on the LNC's official website at <https://www.lp.org/lnc-meeting-archives/>.

18. Exhibit 18 is a true and accurate copy of the official minutes of the LNC executive committee meeting on April 8, 2023, as posted on the LNC's official website at <https://www.lp.org/lnc-meeting-archives/>.

19. I have reviewed the LNC meeting minutes provided in Exhibits 14, 15, and 16, as well as the other minutes posted on the LNC's official website at <https://www.lp.org/lnc-meeting-archives/>, and have confirmed that the LNC has not taken any vote to revoke LPM's disaffiliate status, which requires a $\frac{3}{4}$ supermajority vote for cause under the bylaws of the Libertarian Party. Further, the LNC has not taken any vote to disaffiliate any individual members of, or groups within, the LPM, nor does it have any power to do so under the bylaws.

20. Exhibit 22 is a true and accurate copy of a printout from the *Independent Political Report* website showing a sampling of articles published by one of its writers between April 15 and May 8, 2023. The printout reflects the content on the website as of the date this declaration was signed.

21. In my role of maintaining the LPM's social media accounts, I have made numerous posts referencing the ongoing dispute between the LPM elected leadership (*i.e.*, the individuals listed at <https://michiganlp.net/about-us/leadership/>) regarding the LNC's recognition of Andrew Chadderdon as the LPM chair, including the following:





Michigan Libertarians (Official LPM)
@MILibertarians

...

The LPM has a goal to raise an additional \$5000 in the next 3 weeks in order to ensure that there are adequate resources to pursue a dispositive motion, which, if successful, would bring the LNC's lawsuit against the LPM to a just resolution.

Donate: tinyurl.com/donatelpmldf

Edwards.

Traditionally, the Libertarian Party has operated on a despotic basis, with a maximum degree of independence afforded to each state affiliate to conduct their own business and receive their own supplies. This policy is a reflection of Libertarian values, which emphasize the value of citizens and placing as much power as possible at the local level. This policy preference is enshrined in the Libertarian National Committee Bylaws, which state that "The autonomy of the affiliate and affiliate who parties shall not be usurped by the National Committee or any other committee of the Party."

In recent months, there has been a leadership dispute among Libertarians in the State of Michigan. There are no factions or divisions within the Libertarian Party in the State of Michigan. The members of the Libertarian Party of Michigan are working the dispute out on their own, and is the Michigan Chapter. It has long been the policy of the Libertarian National Committee to refrain from directly involving themselves in state affiliate leadership disputes, such as the one which is unfolding in Michigan, preferring to allocate the resources of the state affiliates to resolve their disputes for themselves.

Unfortunately, the current Libertarian National Committee has chosen a very different, very un-Libertarian path. The National Committee has not only usurped the power of all against the Libertarian Party in the State of Michigan, including the current and former Chair, the most recent gubernatorial candidate, the most recent candidate for Secretary of State, and multiple members of the current board of state of the National Committee, but has also sought to have a majority of the Libertarian National Committee members stripped from calling themselves the Libertarian Party of Michigan for no other reason than because the National Committee believes the state affiliate of the party deserves to be a party of its own.

The claims against these Michigan activists are preposterous. The National Committee of the Libertarian Party is a preposterous. Indeed, the Libertarian Party is an absolute attempt to trademark their name many years ago, and the Republicans, for their part, have never tried, waiting the filly of such a claim. There is a very good reason for this: a trademark holder who fails to take steps to protect their trademark essentially loses that right through non-use. knowingly allowing a third party to appropriate trademark rights without taking action not only creates confusion in the marketplace, but also undermines, undermines, and betrays both the strength and validity of the trademark itself. The so-called "Libertarian Party" and its logos which are the basis of the Michigan National are and have been widely disseminated and used by individuals for many years now, including by politicians, public, professional groups, and private groups with the party's own principles. In short, the National Committee to usurp the Libertarian Party's trademark is a blatant attempt to usurp the Libertarian Party's trademark and to create a new group of Libertarian activists to be used to usurp the party's trademark, and in the process, the most likely outcome is a copy that the Libertarian National Committee will be told that their trademark is

unrecoverable. Indeed, this appears to have been the advice that the Libertarian National Committee has been given by their attorneys in the past.

The Libertarian National Committee is able to use their intellectual property to exploit themselves for purely state party leadership disputes. The reason that our state and local party affiliates are a jurisdiction from one another to become a public myth. The National Committee is allowed to trademark using the Courts to harass activists. The Party will continue to be consumed by internal divisions and state, indeed activists will become demoralized, unwilling to devote their time to important party work if their status may merely be a lawsuit. Courts, unfortunately in their money being used to sue other libertarians, and not new causes and people to donate their hard-earned money to. And equally sad, many of the party's leaders are being threatened, and those not to run for office. This lawsuit is a threat to everything that David Nolan and generations of libertarians achieved here in Michigan to build.

The right Michigan activists who are extending themselves in this lawsuit require continued financial support to mount a legal defense. The right now working is correct with one attorney, and facing a steep legal defense bill will be required to ensure that this case reaches the federal courtrooms. Unlike the Libertarian National Committee, they cannot take money from donors and reappropriate it for this allegedly anti-Libertarian purpose in the spirit of voluntary will and recognition of the importance of this case and what it means for the future of the party, please make a donation at the link below and encourage your friends to do the same. Thank you to all who have helped us so far.

4:03 PM · Jun 20, 2023 · 1,757 Views

22. Aside from the allegations made in the court filings in this lawsuit, I have not received any complaints that michiganlp.net or LPM's social media accounts misleadingly suggest that the LNC supports the elected leadership in the ongoing governance dispute with Mr. Chadderdon.

23. Nevertheless, in an abundance of caution to ensure that no one is misled into mistakenly donating to the elected leadership, the following disclaimer was added to the donation pages on michiganlp.net on June 30, 2023:

Notice of Ongoing Governance Dispute

The Libertarian Party of Michigan (LPM) is the state-level affiliate of the Libertarian Party. Since early 2023, there has been a governance dispute in which two separate groups claim to be the legitimately elected members of LPM's executive committee, which functions as the party's leadership at the state level. The two groups are operating independently from each other, conducting their own fundraising, and holding party funds in separate accounts.

The funds donated through this webpage will be placed in the management of the executive committee chaired by Mike Saliba. For a detailed explanation of the origins of the governance dispute and the reasons why Mr. Saliba is LPM's legitimately elected chair, please see [this letter from LPM's legal counsel](#).

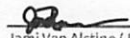
Notably, the Libertarian National Committee (LNC), which is the governing arm of the Libertarian Party at the national level, has thrown its support behind Mr. Chadderdon. The LNC is currently suing Mr. Saliba and other executive committee members for trademark infringement. Funds donated to the Legal Defense Fund on this website will be used to defend against the trademark suit and in other pending litigation relating to the governance dispute.

If you would like to donate to the rival board chaired by Mr. Chadderdon, you are on the wrong website. The Chadderdon faction's website can be accessed via [this link](#).

I declare under penalty of perjury that the foregoing is true and correct.

Jul 7, 2023

Executed on _____


Jami Van Alstine (Jul 7, 2023 06:13 GMT+2)

Jami Van Alstine







Van Alstine Affidavit (revised)[69]

Final Audit Report

2023-07-07

Created:	2023-07-06
By:	Charles Curcio (ncurcio@curciofirm.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA-LSHD3KFLczY3h-4_zav1KBqqY4hDIMg

"Van Alstine Affidavit (revised)[69]" History

-  Document created by Charles Curcio (ncurcio@curciofirm.com)
2023-07-06 - 5:51:10 PM GMT- IP address: 97.91.5.46
-  Document emailed to jamiracquel2004@yahoo.com for signature
2023-07-06 - 5:52:52 PM GMT
-  Email viewed by jamiracquel2004@yahoo.com
2023-07-07 - 4:08:00 AM GMT- IP address: 87.248.116.147
-  Signer jamiracquel2004@yahoo.com entered name at signing as Jami Van Alstine
2023-07-07 - 4:13:09 AM GMT- IP address: 192.145.10.234
-  Document e-signed by Jami Van Alstine (jamiracquel2004@yahoo.com)
Signature Date: 2023-07-07 - 4:13:11 AM GMT - Time Source: server- IP address: 192.145.10.234
-  Agreement completed.
2023-07-07 - 4:13:11 AM GMT